

Appl. No.: 09/827,127
Amendment Dated 10/07/2005
Reply to Office Action of 07/11/2005

REMARKS/ARGUMENTS

As described below, Claims 20 and 31 have been amended to clarify the invention without raising new issues. As such, the amendments should be substantively considered at the juncture and pending rejection should be overcome. Based on the foregoing amendments and the following remarks, Applicant respectfully requests reconsideration of the present application and allowance of the pending set of claims.

Pending Claims 20-24 and 31-36 have been rejected under 35 USC § 102(e) as being anticipated by U.S. Patent No. 6,310,882 to Lorenz et al. Claims 25-27 and 37-39 have been rejected as being unpatentable under 35 USC § 103 over Lorenz considered in combination with U.S. Patent No. 6,052,276 to Do et al., and Claims 28-30 and 40-42 have been rejected as being unpatentable over Lorenz considered alone.

The Office Action asserts that the non-equivalent nature of the components on either side of the communication link is not reflected in the claims. To further clarify the claimed invention, Claim 20 has been amended to recite that second framework is different than the first framework. Claim 31 has been amended to recite that the switched network card is different than the circuit card. These amendments are supported by the specification at page 2. Specifically, page 2 states that a special framework is set up for the switched network card that is located on one side of the data communication link and the circuit card is located in a framework on the other side of the data communication link. One of ordinary skill in the art would recognize that these two frameworks are different because the functions of the respective components on either side of the data communication link are different. Additionally, one of ordinary skill in the art would not consider a circuit card as an equivalent of a switched network card, or that an interface transfer card is equivalent to an interface card.

Thus, as discussed in greater detail below, Lorenz fails to disclose or suggest the claimed invention, whether considered alone or in combination with the Do reference.

First, the connection configuration via the data communication link of the invention is not symmetrical. As claimed, the components positioned on both sides of the data communication link are not identical. Specifically, the components on one side of the data communication link include at least one circuit card and at least one interface transfer card, while the components on

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another side of the data communication link include at least one switched network card and at least one interface card, wherein the circuit card is not equivalent to the interface card and the interface transfer card is not equivalent to the switched network card.

In sharp contrast, the Lorenz reference teaches a symmetrical structure via the link (40) for connecting one group of stations (3) with another group of stations (3'). Specifically, as shown in FIG. 3 and stated at column 3, lines 59-60, "FIG.3 shows the switch architecture inside high speed media modules (140), (140')", the high speed modules (140) and (140') are identical components and the elements (19) in them are also identical. Accordingly, elements (140) and (140'), which are identical in Lorenz, cannot be considered to be the equivalent of the circuit card and the switched network card, respectively, of the claimed invention.

Additionally, elements (19) can also not be considered the equivalent of the interface transfer card and the interface card. For example, neither of the claimed interface transfer cards are equivalent to the port means (19) in Lorenz patent. As shown on column 4, lines 45-59 of Lorenz, the port means (19) is used to perform optical-electric conversion (and vice versa), serial-parallel conversion (and vice versa), includes a media access control (MAC), and corresponds to all the media modules (4,4'). In comparison, the recited interface transfer card is used to interface with a particular circuit card and the recited interface card is used to interface with a particular switched network card.

The function of the claimed method/system is different from that of Lorenz. Specifically, the present invention is applied to ATM exchanges, routers, and other communication products positioned at the midway point of a network and serves to carry out data exchange between different network devices. On the contrary, the device in Lorenz is a computer network concentrator which is positioned at a terminating location of a network and directly connected to network terminals, and serves to carry out data exchange between identical network terminals.

In summary, Lorenz fails to teach or suggest the solution defined in the Claims. The passive base card disclosed in Do does nothing to cure the deficiencies of Lorenz. Therefore, Applicant submits that the claimed invention is patentable over the cited references and that all pending prior art rejections have been overcome.

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In view of the remarks made above, Applicant submits that the pending claims are now in condition for allowance and an indication of allowability of the claims is solicited.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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Grace R. Rippey

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Date